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April 22, 2019

VIA ECF

Hon. Jesse M. Furman
United States District Judge
Thurgood Marshall Courthouse
40 Foley Square
Courtroom 1105
New York, New York 10007

**Re: *Fondren v. JPMorgan Chase Bank, et al.*,
No. 1:17-cv-00563 (S.D.N.Y.)**

Dear Judge Furman:

On behalf of Plaintiffs, with the support of Defendants, in the above-referenced litigation, and in accordance with Paragraph 8(e) of the Court's Civil Case Management Plan and Scheduling Order (ECF No. 79) ("Case Management Order"), I write to make a joint request for a thirty-day extension of the expert discovery deadline, which is currently July 29, 2019.

The parties completed fact discovery as scheduled on March 29, 2019, with the exception of one fact witness deposition that occurred, with the Court's permission, on April 10, 2019. Fact discovery has been comprehensive. Among other things, Plaintiffs served three sets of requests for documents, as well as two sets of requests for admissions on Defendants. Additionally, Plaintiffs deposed ten fact witnesses and Defendants' FED. R. CIV. P. 30(b)(6) corporate designee. Overall, Defendants have produced over 270,000 pages of documents. Defendants served interrogatories and document requests on each of the Plaintiffs, and also deposed all of the named Plaintiffs.

Pursuant to the Court's Case Management Order, the parties have met and conferred (and continue to do so) about the "schedule for expert disclosures, including reports, production of underlying documents, and depositions." *Id.*, ¶ 9(g)). The parties anticipate utilizing a number of experts for each side with respect to damages and other case-related issues, and contemplate a sequence for production of expert reports that requires the parties to simultaneously serve initial reports followed by an opportunity to file rebuttal and reply reports prior to expert depositions. The parties have taken into account the sheer amount of fact discovery that the experts will need to analyze for their reports, the sequencing of the expert reports, the number of expected experts for each side, and the logistics of scheduling multiple depositions in making this joint request. They submit that in light of those considerations, the requested extension, which is sought in good faith and not for the purpose of delay, is reasonable and justified. Accordingly, the parties respectfully ask that the Court extend the expert discovery deadline until August 28, 2019.



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Counsel are available at the convenience of the Court to answer any questions the Court may have regarding the foregoing.

Respectfully submitted,

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/s/ Mark K. Gyandoh

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cc: All counsel of record (via ECF)